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**ATTORNEYS FOR PLAINTIFF  
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

<b>UNITED STATES OF AMERICA,</b>	<b>CR 19-20-GF-BMM</b>
<b>Plaintiff,</b>	
<b>vs.</b>	
<b>JAMES EDWARD SNELL, JR.,</b>	<b>OFFER OF PROOF</b>
<b>Defendant.</b>	

## **THE CHARGE**

The defendant, JAMES EDWARD SNELL, JR., is charged by indictment in counts I and III with Abusive Sexual Contact, in violation of 18 U.S.C. §§ 1153(a) and 2244(a)(5), counts II, IV, VI, VIII, X, XII, and XIV with Sexual Exploitation of a Child, in violation of 18 U.S.C. §§ 2251(a) and 2, and counts V, VII, IX, XI, and XIII with Aggravated Sexual Abuse, in violation of 18 U.S.C. §§ 1153(a) and 2241(c). The indictment also contains a forfeiture allegation, which seeks to forfeit the following items:

- Samsung model SM-T310 Galaxy Tablet;
- SanDisk 4 GB micro SD card;
- Samsung 16 GB micro SD card (installed);
- Samsung 16 GB micro SD card;
- SanDisk 32 GB micro SD card; and,
- LG cellular telephone IMEI.

## **PLEA**

The defendant, JAMES EDWARD SNELL, JR., will enter a voluntary plea of guilty to count V of the indictment. The motion for change of plea filed with the Court represents, in the government's view, the most favorable disposition of the case against the defendant. *See, e.g., Missouri v. Frye*, 132 S. Ct. 1399 (2012).

## **ELEMENTS**

The defendant will plead guilty because the defendant is guilty of the charge contained in the indictment. In pleading guilty, the defendant acknowledges that:

**First**, the defendant is an Indian person;

**Second**, the crime occurred on the Fort Belknap Indian Reservation;

**Third**, the defendant knowingly engaged in a sexual act with “Jane Doe”; and,

**Fourth**, at the time, “Jane Doe” was under the age of twelve years.

## **PENALTY**

Count V in the indictment charges the crime of Aggravated Sexual Abuse, in violation of 18 U.S.C. §§ 1153(a) and 2241(c). This offense carries a mandatory minimum of 30 years to life imprisonment, a \$250,000 fine, five years to life supervised release, and a \$100 special assessment.

## **ANTICIPATED EVIDENCE**

If this case were tried in United States District Court, the United States would prove the following:

The investigation uncovered photographs and videos of James Edward Snell, Jr., and Geneva Marie Nadeau sexually abusing “Jane Doe.” One photograph displays James Edward Snell, Jr., having “Jane Doe” perform oral sex on him, which means Snell’s penis was inside the mouth of “Jane Doe.” The metadata showed the photograph was taken on approximately September 2, 2015. “Jane

Doe” was between two and four years old at the time the sex act occurred. The defendant’s wife, Geneva Marie Nadeau, confirmed the male in the photograph, whose penis was inside the mouth of “Jane Doe,” was Snell. Nadeau previously pleaded guilty to inserting a dark-colored dildo in the anus of “Jane Doe.”

Subsequent investigation found child pornography on the following devices, all of which are subject to forfeiture:

- Samsung model SM-T310 Galaxy Tablet – SN RF2DB2EA3AD;
- SanDisk 4 GB micro SD card;
- Samsung 16 GB micro SD card (installed);
- Samsung 16 GB micro SD card;
- SanDisk 32 GB micro SD card; and,
- LG cellular telephone IMEI.

All of the above activities occurred on the Fort Belknap Indian Reservation. Snell is an enrolled member of the Fort Belknap Indian Community of the Fort Belknap Reservation of Montana, which is a federally recognized Tribe. Snell therefore is an Indian person.

The United States would have presented this evidence through the testimony of expert witnesses, law enforcement, and lay witnesses.

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DATED this 3rd day of July, 2019.

KURT G. ALME  
United States Attorney

/s/ Ryan G. Weldon  
RYAN G. WELDON  
Assistant U.S. Attorney